

# **EXHIBIT N**

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April 24, 2020

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Partridge Snow & Hahn  
30 Federal Street  
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Matthew H. Greene, Esq.  
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695 Atlantic Avenue  
Boston, MA 02111

Re: Larson v. Dorland et al.  
U.S. District Court for the District of Massachusetts  
Docket Number: 1:19-cv-10203-IT

Dear Suzanne and Matthew:

This letter together with the enclosures, constitutes Sonya Larson's Initial Disclosures under Fed. R. Civ. P 26(a)(1).

*Rule 26(a)(1)(A)(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;*

In addition to the Plaintiff and all Defendants in this Action, the following individuals may have discoverable information.

1. Graham Ambrose, former correspondent for the *Boston Globe*; 847-714-2211; Subject: Interference by Cohen Law and Attorney Cohen with Larson's BBF contract; commission by Cohen Law and Attorney Cohen of violations of MGL. C. 93A; defamation by Dorland.

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2. Norah Piehl, Director of the Boston Book Festival, 32R Essex Street, Cambridge, MA 02139, 857-706-1101; Subject: Interference by Cohen Law and Attorney Cohen with Larson's BBF contract; commission by Cohen Law and Attorney Cohen of violations of MGL. C. 93A; defamation by Dorland; damages related to lost opportunities resulting from the cancellation of the One City/One Story project featuring *The Kindest*.
3. Deborah Porter, Founder and Former Director of the Boston Book Festival, 32R Essex Street, Cambridge, MA 02139, 857-706-1101; Subject: Interference by Cohen Law and Attorney Cohen with Larson's BBF contract; commission by Cohen Law and Attorney Cohen of violations of MGL. C. 93A; defamation by Dorland; damages related to lost opportunities resulting from the cancellation of the One City/One Story project featuring *The Kindest*.
4. Jennifer Grotz, Director of the Bread Loaf Writers' Conference; 204 College Street, Middlebury College, Middlebury, VT 05753; 802-443-5286; Subject: Defamation by Dorland.
5. Noreen Cargill, Administrative Director of the Bread Loaf Writers' Conference; 204 College Street, Middlebury College, Middlebury, VT 05753; 802-443-5286; Subject: Defamation by Dorland.
6. Lauren Francis-Sharma, Assistant Director of the Bread Loaf Writers' Conference; 204 College Street, Middlebury College, Middlebury, VT 05753; 802-443-5286; Subject: Defamation by Dorland.
7. Jason Lamb, Coordinator of the Bread Loaf Writers' Conferences, [jlamb@middlebury.edu](mailto:jlamb@middlebury.edu); 204 College Street, Middlebury College, Middlebury, VT 05753; 802-443-5286; Subject: Defamation by Dorland.
8. Michael Collier, Former Director of the Bread Loaf Writers' Conference and Professor at the University of Maryland; Department of English, 2119 Tawes Hall, College Park, MD 20742; Subject: Defamation by Dorland.
9. Rebecca Markovits, editor of American Short Fiction, P.O. Box 4152; Austin, TX 78765; as well as other staff and board members of ASF yet to be identified; Subject: Defamation by Dorland.

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10. Eve Bridburg, Founder and Executive Director of GrubStreet, 162 Boylston Street, Boston, MA 02116, 617-695-0075; Subject: Defamation by Dorland.
11. Ian Jude Chio, Chief Financial Officer of GrubStreet, 162 Boylston Street, Boston, MA 02116, 617-695-0075; Subject: Defamation by Dorland.
12. Kathy Sherbrooke, Chair of the Board of Directors of GrubStreet, 162 Boylston Street, Boston, MA 02116, 617-695-0075; Subject: Defamation by Dorland.
13. Christopher Castellani, Artistic Director of GrubStreet, 162 Boylston Street, Boston, MA 02116, 617-695-0075; Subject: Defamation by Dorland; Damages related to lost productivity and emotional distress.
14. Adam Stumacher, writer and member of Larson's writing group, 2 Autumn Hill Ln, Southborough, MA 01772, 617-642-2220; Subject: Defamation by Dorland; Damages related to lost productivity and emotional distress.
15. Jennifer De Leon, writer and member of Larson's writing group; 2 Autumn Hill Ln, Southborough, MA 01772, 508-505-1082; Subject: Defamation by Dorland; Damages related to lost productivity and emotional distress; lost opportunities when the BBF cancelled *The Kindest* as the One Story/One City winner.
16. Chip Cheek, writer and member of Larson's writing group; 2012 Carnegie Lane B, Redondo Beach, CA 90278; 917-586-0463; Subject: Defamation by Dorland; Damages related to emotional distress;
17. Daphne Kalotay, writer and previous winner of One City/One Story competition of the BBF; 245 Beacon Street #8, Somerville, MA 02143, 857-225-2604; Subject: Damages related to lost opportunities when the BBF cancelled the One City/One Story program featuring *The Kindest*.
18. Eson Kim, colleague; Grub Street, 162 Boylston Street, Boston, MA 02116, 617-695-0075; Subject: Damages related to lost productivity and emotional distress.
19. Dariel Suarez, colleague; Grub Street, 162 Boylston Street, Boston, MA 02116, 617-695-0075; Subject: Damages related to lost productivity and emotional distress.

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20. Sean van Deuren, colleague; Grub Street, 162 Boylston Street, Boston, MA 02116, 617-695-0075; Subject: Damages related to lost productivity and emotional distress.
21. Hanna Katz, colleague; Grub Street, 162 Boylston Street, Boston, MA 02116, 617-695-0075; Subject: Damages related to lost productivity and emotional distress.
22. Erin Cohen, colleague; Grub Street, 162 Boylston Street, Boston, MA 02116, 617-695-0075; Subject: Damages related to lost productivity and emotional distress.
23. Lauren Rheaume, colleague; Grub Street, 162 Boylston Street, Boston, MA 02116, 617-695-0075; Subject: Damages related to lost productivity and emotional distress.
24. Alyria Abbott, colleague; Grub Street, 162 Boylston Street, Boston, MA 02116, 617-695-0075; Subject: Damages related to lost productivity and emotional distress.
25. Celeste Ng, friend and fellow writer; 42 Stearns Street, Cambridge, MA 02138, 617-347-7409; Subject: Damages related to emotional distress.
26. Whitney Scharer, friend and fellow writer; 20 Jason Street, Arlington, MA 02476, 617-308-6816; Subject: Damages related to emotional distress.
27. Grace Talusan, friend and fellow writer; 67 Frederick Ave., Medford MA 02155, 617-359-5291; Subject: Damages related to emotional distress.
28. Calvin Hennick, friend and fellow writer; 31 Parkway Crescent, Milton, MA 02186, 917-569-2992; Subject: Damages related to emotional distress.
29. Alex Marzano-Lesnevich, friend and fellow writer; 201-280-7884; Subject: Damages related to emotional distress.
30. Becky Tuch, friend and fellow writer; 5506 5th Avenue, #216B, Pittsburgh, PA 15232, 617-331-9109; Subject: Damages related to emotional distress.
31. Lisa Borders, friend and fellow writer; 1917 Commonwealth Avenue, Auburndale, MA 02466, 617-513-6988; Subject: Damages related to emotional distress.
32. Anya Weber, friend and fellow writer; [anya.r.weber@gmail.com](mailto:anya.r.weber@gmail.com), 617-314-3248; Subject: Damages related to emotional distress.

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33. Sari Boren, friend and fellow writer; 189 Walden Street #2, Cambridge, MA 02140, 617-939-3712; Subject: Damages related to emotional distress.

*Rule 26(a)(1)(A)(ii) A copy--or a description by category and location--of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;*

Plaintiff is producing the following documents and things.

- The Kindest – Five variations including the Brilliance Variant; the Audible Variant; the ASF Variant; the Variant submitted to the BBF for the One City/One Story competition; and the Final BBF Variant.
- Escrow Agreement by and between Larson and the BBF and Gregorio, PLLC.
- Charles Schwab Domestic Wire Transfer Request for \$10,000, dated August 6, 2018, from the account of Sonya Clare Larson to First Bank in Greensboro, NC. (Redacted)
- Email correspondence by and between Graham Ambrose of the Boston Globe and Larson, from June through August 2018.
- Email correspondence by and between Graham Ambrose of the Boston Globe and Eve Bridburg of GrubStreet, Inc., dated July 23, 2018.
- Letter sent by Larson to Ambrose of the Boston Globe.
- Email from Deborah Porter to Larson dated August 13, 2018.
- Email correspondence by and between Jeffrey Cohen and Epstein regarding U.S. Express Mail letter sent in October 2018, and direct communication from Dorland to Epstein.
- Email chains by and between Larson and Norah Piehl of the BBF in June and July 2018.
- Two email chains by and between Larson and Rebecca Markovits of American Short Fiction in June 2018.

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- Various emails in July 2015, and June and July 2016, by and between Dorland and Larson.
- Emails by and between Adam Stumacher and Dorland dated July 27-28, 2018.
- Emails between Jennifer Grotz and Larson including emails from Dorland and Jason Lamb, Coordinator, Bread Loaf Writer's Conferences, Middlebury College. And Noreen Cargill, Middlebury College, in June and August, 2018.
- Emails by and between Larson and Jennifer Lee and Chaz Curet at Plympton between July and October 2016.

Exhibits A through P, which are attached to Plaintiff's Amended Complaint, and Exhibits A through F which are attached to Plaintiff's Opposition to one or more of Defendants' Motions to Dismiss are not being produced with this Initial Disclosure since they are already part of the record. Copies will be produced on request. Omitted from this production are communications that may be subject to Ms. Larson's attorney/client privilege.

*Rule 26(a)(1)(A)(iii) A computation of each category of damages claimed by the disclosing party--who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.*

## Damages

### **Lost Opportunities in an amount to be determined:**

- Distribution in print of 30,000 copies of *The Kindest* in English and Spanish, distributed to every branch of the Boston Public Library, the MBTA, and more than 40 bookstores, literary centers and shops, as well as online distribution in English and Spanish.
- Translation of the story into Mandarin, Russian, Portuguese, Spanish, Haitian-Creole and French, to be posted online for free downloading.
- Likely interviews and features on WBUR, the *Boston Globe*, the *Somerville Times*, and other media outlets that have typically featured the winning One City/One Story authors and stories in years past.
- Two to three appearances and live discussions at the Boston Book Festival.
- Likely 5-15 discussions about the work at Boston-area schools, colleges, library branches, community centers, and classrooms.

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- Untold other opportunities brought about by new readership, including possible book deals and sale of film rights.
- Promotion of The Kindest via the Boston Book Festival's press releases and social media feeds including to the BBF Twitter followers.
- Appearances at numerous events including but not necessarily limited to Books on the T.
- Special celebration in Cambridge
- Satellite festival in East Boston as well as in Copley Square.

**Lost Money: damages to be determined.**

- Total legal fees and related expenses.

**Lost Productivity: damages to be determined.**

- At Work: Plaintiff was interrupted at doing her job, especially as Ms. Dorland continued to make legal threats to her and the Boston Book Festival. Plaintiff missed many meetings and had to delay several projects.
- Prior to June 7<sup>th</sup>, Plaintiff was writing on a four-week fellowship. After June 7<sup>th</sup>, her writing virtually stopped as a result of the accusations of Ms. Dorland.
- Plaintiff had to rescind or delay reprints of "The Kindest" with four anthologies that wanted to include it in an anthology.
- Canceled and delayed manuscript consultations with writers which resulted in the loss of income and opportunities.
- Plaintiff had to cancel scheduled trip to Montreal from July 19-23<sup>rd</sup>, due to need to respond to accusations of Ms. Dorland and Cohen Law resulting in a loss of income.

**Evidence of Emotional Distress: damages to be determined.**

- Extreme anxiety. Frequently sought advice and assurance from professionals, family and friends.
- Plaintiff felt she was being stalked by Dorland and she investigated the process of obtaining a restraining order against Dorland after Dorland contacted her workplace.
- Difficulty sleeping—took sleeping pills nights nightly for weeks in order to aid in sleeping.
- Difficulty eating and keeping food down which resulted in loss of weight.
- Extreme anxiety in trying to cope with the events perpetrated by Dorland and Cohen Law.

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Plaintiff reserves the right to supplement these initial disclosures as additional witnesses and documents are discovered. Also, I was hampered in preparing these disclosures as a result of the inability to meet in person with Ms. Larson to review all of the documents and disclosures.

Very truly yours,

Andrew D. Epstein